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**VIA FACSIMILE
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Chambers of Judge Gerald Bruce Lee
Albert V. Bryan U.S. Courthouse
401 Courthouse Square
Alexandria, VA 22314

Re: *Timothy Bateman v. American Airlines, Inc.*
Case No. 1:07-CV-1307

Dear Judge Lee:

Per the Court's request, Defendant American Airlines, Inc. ("American Airlines") has attached two documents reflecting Defendant's plan to reduce companywide headcount of the Onboard Services department in 2006. In addition, attached is a document confirming that Mr. Bateman was on unpaid leave between April 23, 2004 and January 6, 2006.

The Onboard Service Headcount dated November 9, 2005 ("November Onboard Service Headcount"), attached as Exhibit A, reflects, among other things, the following information:

1. Total headcount for Onboard Services under American Airlines' 2005 Plan;
2. The target for 2006, which was a 5% reduction in headcount (system-wide); and
3. The current headcount as of the date the report was issued on November 9, 2005.

The headcount and target information is specified for the respective regions within Onboard Services. Plaintiff worked in the NorthEast Region, specifically DCA. In addition, the Court will note that the document includes separate headcounts for management and support staff. The November Onboard Service Headcount reflects that the companywide headcount for managers in Onboard Service was 331.1 in November 2005 with a 2006 target of 321.8. With respect to the NorthEast Region, the November Onboard Service Headcount reflects that the headcount at that time was 55 with a target of 55.1. Thus, at the time of the November Onboard Service Headcount, there was no anticipated need to reduce headcount in Onboard Service management within the NorthEast Region. This demonstrates that the need to reduce headcount among Onboard Services management in the Washington, D.C. area did not become apparent until late December 2005, when Plaintiff

informed American Airlines that he would be returning to work. Only then did the headcount compliment in DCA rise above the target number.¹

The Onboard Service Headcount dated December 15, 2005 ("December Onboard Service Headcount") is attached as Exhibit C. This document reflects, among other things, the following information:

1. Total headcount for Onboard Services under Defendant's 2005 Plan;
2. The 2006 Plan, which reflected a 5% system-wide reduction in headcount;
3. The headcount as of the date the report was issued on December 15, 2005; and
4. The "Variance to Target," which is the difference between the current headcount and the 2006 target headcount.

The December Onboard Service Headcount reflects that the companywide headcount for managers in Onboard Services was 325, but the 2006 target was 321.8. In addition, the December Onboard Service Headcount reflects that, for the NorthEast Region, the headcount at that time was 55 and the target was 55.1. Again, this demonstrates that the need to reduce headcount in the Washington area did not become apparent until late December 2005, when Plaintiff informed American Airlines that he would be returning to work.

Respectfully,



Rafael E. Morell

Enc.

cc: Michael Pritchard (with exhibits)

7052511.1 (OGLETREE)

¹ Plaintiff was on unpaid leave from April 2004 to January 2006 (Exhibit B). The effect of Plaintiff's return to work and the payroll on the headcount and the 2006 reduction in force is described in the Memorandum in Support of American Airlines, Inc.'s Motion for Summary Judgment (p.8-10).

EXHIBIT A

Onboard Service Headcount

MD	Region	2005 Annual Plan*	5% Target	CURRENT	Variance to Target	Sept Actual	Sept Variance to Target
Management							
2 Burnett	DFW	47	44.7	47	(2.35)	48.2	(3.6)
2 Campagna	Western	44	41.8	43	(1.20)	43	(1.2)
1 Carvatta	ORD	34	32.3	32	0.30	34.7	(2.4)
2 Lopes	Safety / Ops	30	28.5	30	(1.50)	30	(1.5)
1 McKee	JFP	12.9	12.3	13	(0.75)	13	(0.7)
1 McKee	F&B	20.8	19.8	20	(0.24)	21	(1.2)
Pearson	SouthEast	40	38.0	40	1.00	36	2.0
Pearson	LAM	12	11.4	12	(0.60)	10	1.4
Scheu	HDQ	41	39.0	43	(4.05)	41	(2.1)
1 Tiliacos	NorthEast	58	55.1	55	0.10	54.5	0.6
Curtis	VP	1	0.95	1	(0.05)	1	(0.05)
Delayed Replacement		(2.00)	(1.90)	(1.90)	0.00		(1.90)
Onboard Service Total		338.7	321.8	331.1	(9.33)	332.4	(10.6)
Support Staff							
Burnett	DFW	16.5	15.7	16.5	(0.83)	17	(1.3)
Campagna	Western	16.5	15.7	15.8	(0.13)	16	(0.3)
Carvatta	ORD	12	11.4	11.5	(0.10)	11.9	(0.5)
Lopes	Safety / Ops	12	11.4	11	0.40	10	1.4
McKee	JFP	2	1.9	2	(0.10)	2	(0.1)
McKee	F&B	11	10.5	11	(0.55)	11	(0.6)
Pearson	SouthEast	14	13.3	14	0.30	13.5	(0.2)
Pearson	LAM + Planners	4	3.8	4	(0.20)	8	(4.2)
Scheu	HDQ	14	13.3	15.5	(2.20)	15.5	(2.2)
Tiliacos	NorthEast	19	18.1	18	0.05	16.8	1.3
Flex Vacation		(1.30)	(0.84)	(0.84)	0.00	0	(0.8)
Onboard Service Total		119.7	114.1	117.46	(3.36)	121.7	(7.6)

1/ F&B - 8 Financial Control heads transferred from F&B to HDQ. September actuals equals filled positions as of 10/1

2/ HDQ - 8 Financial Control positions moved from F&B to HDQ

3/ Moved 17 training positions from HDQ to Safety. Management (9) and Support Staff (8)

4/ JFP September actuals equals filled positions as of 10/1

5/ Budgeted LAM Mgmt HC .6 heads and SS .2 heads higher than target. SE Mgmt budgeted 1.0 lower and SS .3 lower than target. Result of Crew Planners changing

* Annual Plan adjusted for Onboard Service Reorg

- 8 Management transferred from F&B to HDQ Fin Planning

- 9 Management and 8 Support Staff transferred from HDQ training to Safety FA training

EXHIBIT B

Overview IT 0000 - Actions

[illegible]

Start date	End date	Act	Action type	ActR	Reason factor	C	F
01/01/2000	29/11/2000	10	Operation	04	Initial Fill	10	05
01/05/2000	31/10/2000	07	Fill LY about CHG of R00	01	Initial Fill	03	03
04/23/2000	01/05/2000	55	LOA - Unplanned	02	Initial Fill	01	10
12/15/1999	01/22/2000	06	Conversion	00	Initial Fill	01	03
05/20/1995	12/11/1999	01	Initial	01	Initial Fill	05	03

EXHIBIT C

Onboard Service Headcount

MD	Region	2005	2006 Plan	CURRENT	Variance to Target
		Annual Plan*	(5% Target)		
<u>Management</u>					
Burnett	DFW	47	44.7	45	(0.35)
Campagna	Western	44	41.8	42	(0.20)
Carvatta	ORD	34	32.3	32	0.30
Lopes	Safety / Ops	30	28.5	29	(0.50)
McKee	IFP	12.9	12.3	13	(0.75)
McKee	F&B	19.8	18.8	19	(0.19)
Pearson	SouthEast	40	38.0	36	2.00
Pearson	LAM	12	11.4	12	(0.60)
Scheu	HDQ	42	39.9	41	(1.10)
Tilacos	NorthEast	58	55.1	55	0.10
Curtis	VP	1	0.95	1	(0.05)
Delayed Replacement		(2.00)	(1.90)	0.00	(1.90)
Onboard Service Total		338.7	321.8	325	(3.23)
<u>Support Staff</u>					
Burnett	DFW	16.5	15.7	15.5	0.17
Campagna	Western	15.5	14.7	15.8	(1.08)
Carvatta	ORD	12	11.4	11.5	(0.10)
Lopes	Safety / Ops	10.5	10.0	10	(0.03)
McKee	IFP	2	1.9	2	(0.10)
McKee	F&B	11	10.5	11	(0.55)
Pearson	SouthEast	14	13.3	12.5	0.80
Pearson	LAM + Planners	4	3.8	4.5	(0.70)
Scheu	HDQ	16.5	15.7	15.5	0.17
Tilacos	NorthEast	19	18.1	18	0.05
Flex Vacation		(1.30)	(0.84)	0.00	(0.84)
Onboard Service Total		119.7	114.1	116.3	(2.19)
			435.9		

1/ F&B - 8 Financial Control heads transferred from F&B to HDQ. September actuals equals filled positions as of 10/1

2/ HDQ - 8 Financial Control positions moved from F&B to HDQ

3/ Moved 17 training positions from HDQ to Safety. Management (9) and Support Staff (8)

4/ IFP September actuals equals filled positions as of 10/1

5/ Budgeted LAM Mgmt HC .6 heads and SS .2 heads higher than target. SE Mgmt HC budgeted 1.0 lower and SS .3 lower than target.
Result of Crew Planners changing from SS to Mgmt

* Annual Plan adjusted for Onboard Service Reorg
- 8 Management transferred from F&B to HDQ Fin Planning
- 9 Management and 8 Support Staff transferred from HDQ training to Safety FA training